**NO. 49103-6**

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**COURT OF APPEALS, DIVISION II**
**STATE OF WASHINGTON**

STATE OF WASHINGTON, RESPONDENT

v.

ROBERT DENGLER, JR., APPELLANT

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Appeal from the Superior Court of Pierce County
The Honorable Kathryn J. Nelson, Judge

No. 15-1-01759-6

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# BRIEF OF RESPONDENT

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A. ISSUES PERTAINING TO APPELLANT'S ASSIGNMENTS OF ERROR.

1. Has the defendant failed to establish an ineffective assistance of counsel claim because he cannot establish deficient and prejudicial performance as a motion to admit the offered evidence under ER 613 would have been denied as being extrinsic evidence of a collateral matter?

B. STATEMENT OF THE CASE.

1. Procedure

On March 17, 2016, Robert Dengler, Jr., hereinafter "defendant" was charged by corrected amended information with rape of a child in the third degree, and three counts of child molestation in the third degree. CP 28-29. Before trial, the State filed motions in limine, which included a motion to exclude evidence that the victim, T.M., had been sexually abused on prior occasions by individuals unrelated to this case. CP 18-21. Defense filed briefing in response. CP 66-70. After the State rested its case, a hearing was held outside the presence of the jury regarding the issue of prior allegations made by T.M.[1] Defense sought to introduce evidence that T.M. allegedly told her aunt, Corrie Dengler[2], that she had made 9-10 false accusations of sexual abuse committed by people other

[1] A recitation of the facts from the separate hearing are contained in a section below.
[2] Due to the defendant, Corrie Dengler, and Joseph Dengler all having the same last name, the State will refer to Corrie Dengler and Joseph Dengler by their first names to avoid confusion.

than the defendant, and that T.M. had staged a false suicide attempt in the past. 4RP 266, 269-270. The court, citing ER 608, held that the defense would be allowed to call T.M. to question her about those matters, but that defense would not be allowed to admit extrinsic evidence via Corrie. 5RP 362. The case then proceeded with the defense calling T.M. and inquiring if she had told Corrie about false accusations of sexual abuse. T.M. denied having such a conversation with Corrie and also denied that her suicide attempt was staged. 6RP 408.

The defendant was convicted as charged. CP 100-103. He was sentenced on May 27, 2016 to 60 months in custody. CP 106-120.

2. Facts

***a. Facts adduced at trial***

T.M., who was 15 years old at the time of trial, testified that when she was three years of age she was removed from her parents' custody and placed in the care of Child Protective Services (CPS). 3RP 98. Her birth parents were Tina Marquis and Joseph Dengler. 3RP 98. When she was removed to the custody of CPS, T.M. was first placed in a foster home, then lived with the defendant and his wife, Corrie Dengler. 3RP 99. The defendant is T.M.'s uncle. 3RP 115. T.M. reported that she lived with the defendant and his wife for two to three years before she was placed with her birth mother again. 3RP 100. In 2014, T.M. was again removed from her mother's custody and was again placed with the defendant at his home

in Pierce County. 3RP 101, 103. T.M. was fearful of having to go into the foster care system if she did not go with the defendant. 3RP 102. T.M. lived alone with the defendant from June to October of 2014. 3RP 124. At that time, T.M. was 14 years old. 3RP 171.

Within weeks of T.M. moving in with the defendant in 2014, an incident occurred when they were watching a movie at the home. 3RP 107-108. T.M. was seated in a recliner chair and the defendant was laying down with his head in her lap. 3RP 108. The defendant began to rub T.M.'s thighs and vagina with his hands. 3RP 110-111. The contact occurred over T.M.'s clothing. 3RP 112. The defendant then began touching his genital area against T.M. *Id.* During this incident the defendant put his hand under T.M.'s clothing and inserted a finger into T.M.'s vagina. 3RP 114. T.M. told the defendant that she was going to bed, and left the area. *Id.*

The next time something happened was two to three days later. 3RP 117. The defendant entered T.M.'s bedroom and got into bed with her. 3RP 117-120. The defendant touched T.M.'s buttocks with his hand and rubbed her body with his torso. 3RP 120. The defendant ejaculated and T.M. cleaned the semen up after he left. 3RP 120-121. T.M. reported that the defendant would touch her several times a week. 3RP 117. The

conduct would consist of similar behavior, but he would not stop until he ejaculated. 3RP 117.

T.M. reported another incident in which the defendant had replaced the couch in the living room with a futon. 3RP 127. The defendant rubbed his genitalia against her and ejaculated. 3RP 127-128. In October 2014, T.M. was getting ready to go to a school dance. 3RP 123-124. The defendant grabbed T.M. from behind and told her that the dress she was wearing made him horney. 3RP 124-125.

T.M. asked the defendant if they could go to Great Wolf Lodge. 3RP 152. The defendant agreed and booked a room. *Id.* After he booked the room he told T.M. "I want you as a daughter outside and as a girlfriend in the room." 3RP 153. When T.M. did not respond, the defendant became upset and cancelled the reservation the same day. 3RP 154.

T.M. initially disclosed what had been happening to her friend Heather Duff in July of 2014, in hopes that Heather would help her. 3RP 171. Heather did not assist T.M. *Id.* T.M. then disclosed to her boyfriend in October of 2014. 3RP 135-136. It was then reported to an adult, Rhianna Wilson. 3RP 135-136. It was determined that T.M. was going to go talk to the school counselor the following day. 3RP 137. T.M. packed a bag with clean clothing because she knew she was going to be placed into foster care, but did not know where. 3RP 139.

Rhianna Wilson had been living in the same house as T.M.'s boyfriend. 3RP 195. In October of 2014, Wilson was told by T.M. that the defendant had been touching her inappropriately. 3RP 199-200. T.M. disclosed incidents where the defendant would rub himself against her until he ejaculated. 3RP 201. On October 29, 2014, T.M. was examined by Michelle Breland, a pediatric nurses practitioner. 4RP 221, 225. T.M. reported to Breland that the abuse had been committed by her uncle. 4RP 234-235.

The trial court allowed the defense to recall T.M. and ask her about prior allegations of sexual abuse that she disclosed to Corrie Dengler. 6RP 408. T.M. denied speaking to Corrie Dengler about prior incidents of abuse. *Id.* She further denied telling Corrie that some of the accusations were false. 6RP 408-409. T.M. also denied telling Corrie that she had falsified a suicide attempt in order to get out of her current living arrangements. 6RP 408.

The defendant testified on his own behalf. 6RP 413. The defendant denied touching T.M. in any inappropriate manner. 6RP 426-427. The defendant relayed one incident in which he saw T.M. wearing only a towel, but he did not go into her room. 6RP 428.

### *b. Facts from hearing regarding prior allegations*[3]

In its motions in limine, the State moved to exclude reference to any sexual abuse or activity of T.M. prior to 2014. CP 19-21; 3RP 73. Defense counsel stated that he did not intend to introduce evidence regarding the sexual activity of T.M., but that he was intending on introducing evidence that T.M. had made prior false accusations of sexual abuse. 3RP 74. While the court agreed that the defense should not introduce evidence of T.M.'s general reputation for promiscuity, chastity, or sexual mores, the court held that the defense may be able to introduce evidence of false accusations of sexual abuse. 3RP 77. The court held that the defense could provide an offer of proof regarding the instances of false allegations by the victim, and it deferred ruling at the pretrial hearing. 3RP 79.

The defense presented testimony of defendant's ex-wife, Corrie Dengler in the motion held outside the presence of the jury. 4RP 248. The defendant asserted that Corrie and the defendant were married in 1990. 4RP 248. In 2003 or 2004, T.M. came to live with Corrie and the defendant, and resided with them until 2006 or 2007. 4RP 249. In 2008, Corrie and the defendant divorced. 4RP 258.

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[3] The defendant does not challenge the exclusion of credibility or reputation evidence under ER 608. The State therefore does not include facts from the offer of proof regarding that offered evidence.

From June to October of 2014, Corrie would speak to T.M. every day or every other day. 4RP 259. Corrie had believed that T.M. had previously attempted suicide and wanted to check on her well-being. 4RP 261. Once T.M. reported the abuse to the school and left the defendant's home, Corrie had no further contact with her. 4RP 263-264. Corrie testified that T.M. told her that she had falsely accused 9-10 people of sexual abuse. 4RP 270. Corrie also testified that T.M. told her that the suicide attempt was a ploy to move out of her mother's home. 4RP 265.

C. ARGUMENT.

1. DEFENDANT HAS FAILED TO SHOW INEFFECTIVE ASSISTANCE OF COUNSEL BECAUSE HE HAS FAILED TO SHOW THAT HIS COUNSEL'S PERFORMANCE WAS DEFICIENT AND PREJUDICIAL AND A MOTION TO INTRODUCE THE OFFERED EVIDENCE UNDER ER 613 WOULD HAVE BEEN DENIED AS EXTRINSIC EVIDENCE OF A COLLATERAL MATTER.

"Effective assistance of counsel is guaranteed by both the United States Constitution amendment VI and Washington Constitution article I, section 22 (amendment X)." ***State v. Yarbrough***, 151 Wn. App. 66, 89, 210 P.3d 1029, 1040-41 (2009); ***State v. Johnston***, 143 Wn. App. 1, 177 P.3d 1127 (2007). A claim of ineffective assistance of counsel is reviewed *de novo*. ***Yarbrough***, 151 Wn. App. at 89.

"Washington has adopted the ***Strickland*** test to determine whether a defendant had constitutionally sufficient representation." ***State v.***

***Cienfuegos***, 144 Wn.2d 222, 25 P.3d 1011 (2001) (*citing* ***State v. Bowerman***, 115 Wn.2d 794, 808, 802 P.2d 116 (1990)); ***State v. Thomas***, 109 Wn.2d 222, 743 P.2d 816 (1987). That test requires that the defendant meet both prongs of a two-prong test. ***Strickland v. Washington***, 466 U.S. 668, 687, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984). *See also* ***State v. McFarland***, 127 Wn.2d 322, 334-35, 899 P.2d 1251 (1995). "First, the defendant must show that counsel's performance was deficient" and "[s]econd, the defendant must show that the deficient performance prejudiced the defense." ***Strickland***, 466 U.S. at 687; ***Cienfuegos***, 144 Wn.2d at 226-27. A reviewing court is not required to address both prongs of the test if the defendant makes an insufficient showing on either prong. ***State v. Hendrickson***, 129 Wn.2d 61, 78, 917 P.2d 563, 571 (1996); ***In Re Personal Restraint of Rice***, 118 Wn.2d 876, 889, 828 P.2d 1086 (1992); ***State v. Thomas***, 109 Wn.2d 222, 225-26, 743 P.2d 816 (1987). "A failure to establish either element of the test defeats an ineffective assistance of counsel claim." ***Riofta v. State***, 134 Wn. App. 669, 693, 142 P.3d 193 (2006).

The first prong "requires showing that counsel made errors so serious that counsel was not functioning as the 'counsel' guaranteed the defendant by the Sixth Amendment." ***Strickland***, 466 U.S. at 687. Specifically, "[t]o establish deficient performance, the defendant must show that trial counsel's performance fell below an objective standard of reasonableness." ***Johnston***, 143 Wn. App. at 16. "The reasonableness of

trial counsel's performance is reviewed in light of all the circumstances of the case at the time of counsel's conduct." *Id.*; ***State v. Garrett***, 124 Wn.2d 504, 518, 881 P.2d 185 (1994). "Competency of counsel is determined based upon the entire record below." ***State v. Townsend***, 142 Wn.2d 838, 15 P.3d 145 (2001) (*citing* ***State v. McFarland***, 127 Wn.2d 322, 335, 899 P.2d 1251 (1995); ***State v. Gilmore***, 76 Wn.2d 293, 456 P.2d 344 (1969).

"To prevail on a claim of ineffective assistance of counsel, the defendant must overcome a strong presumption that defense counsel was effective." ***Yarbrough***, 151 Wn. App. at 90. This presumption includes a strong presumption "that counsel's conduct constituted sound trial strategy." ***Rice***, 118 Wn.2d at 888-89. "If trial counsel's conduct can be characterized as legitimate trial strategy or tactics, it cannot serve as a basis for a claim that the defendant received ineffective assistance of counsel." ***Yarbrough***, 151 Wn. App. at 90 (*citing* ***State v. McNeal***, 145 Wn.2d 352, 362, 37 P.3d 280 (2002), ***State v. Adams***, 91 Wn.2d 86, 90, 586 P.2d 1168 (1978)).

An ineffective assistance of counsel claim must not be allowed to "function as a way to escape rules of waiver and forfeiture and raise issues not presented at trial, and so the ***Strickland*** standard must be applied with scrupulous care, lest 'intrusive post-trial inquiry' threaten the integrity of the very adversary process the right to counsel is meant to serve." ***Harrington v. Richter***, 131 S. Ct. 770, 778, 178 L. Ed. 2d 624 (2011). "It is 'all too tempting' to 'second-guess counsel's assistance after conviction

or adverse sentence.'" *Id.* (*Quoting* ***Strickland***, 466 U.S. at 689). "The question is whether an attorney's representation amounted to incompetence under 'prevailing professional norms,' not whether it deviated from best practices or most common custom." *Id.* (*Quoting* ***Strickland***, 466 U.S. at 690).

This Court "defer[s] to an attorney's strategic decisions to pursue, or to forego, particular lines of defense when those strategic decisions are reasonable given the totality of the circumstances." ***Riofta***, 134 Wn. App. at 693. If reasonable under the circumstances, trial counsel need not investigate lines of defense that he has chosen not to employ." *Id.*

With respect to the second prong, "[p]rejudice occurs when, but for the deficient performance, there is a reasonable probability that the outcome would have differed." *Id.* "A reasonable probability is a probability sufficient to undermine confidence in the outcome." ***Cienfuegos***, 144 Wn.2d at 229.

In the present case, the defendant argues that "T.M.'s admissions to Corrie Dengler about the prior claims of sexual abuse and the suicide attempt was false would have been admissible under ER 613. . ." BOA, p. 11. As demonstrated below, the record shows that counsel was not deficient and that, if he had made such a motion specifically under ER

613, it would have been denied[4] and therefore no prejudice can be established.

The sixth amendment to the United States Constitution and article 1, section 22 of the Washington State Constitution "grant criminal defendants two separate rights: (1) the right to present testimony in one's defense, and (2) the right to confront and cross-examine adverse witnesses." ***State v. Hudlow***, 99 Wn.2d 1, 14, 659 P.2d 514 (1983) (internal citations omitted). Although a defendant "does have a constitutional right to present a defense, the scope of that right does not extend to the introduction of otherwise inadmissible evidence." ***State v. Aguirre***, 168 Wn.2d 350, 362-63, 229 P.3d 669 (2010).

In other words, "'[a] defendant in a criminal case has a constitutional right to present a defense consisting of relevant evidence that is not otherwise inadmissible.'" ***State v. Rafay***, 168 Wn. App. 734, 795, 285 P.3d 83 (2012) (*quoting* ***State v. Rehak***, 67 Wn. App. 157, 162, 834 P.2d 651 (1992)).

Hence, a criminal defendant has no constitutional right to have irrelevant evidence admitted in his or her defense." ***State v. Mee Hui Kim***, 134 Wn. App. 27, 41, 139 P.3d 354 (2006) (*quoting* ***State v. Thomas***, 150 Wn.2d 821, 857, 83 P.3d 970 (2004) (*quoting* ***State v. Hudlow***, 99 Wn.2d

[4] The defendant is not challenging the trial court's ruling denying the admission of the evidence under ER 608. Because the defendant does not assign error to that ruling, it is not before this court for review and the State does not address it further.

1, 15, 659 P.2d 514 (1983))); ***Washington v. Texas***, 388 U.S. 14, 16, 87 S. Ct. 1920 (1967).

If properly preserved for appeal, a trial court's decision regarding the admissibility of testimonial evidence will only be reversed for a manifest abuse of discretion. ***State v. Aguirre***, 168 Wn.2d 350, 361, 229 P.3d 669 (2010). Likewise, appellate courts "review a trial court's decision to limit cross-examination of a witness for impeachment purposes for abuse of discretion." *Id.* at 361-62. Such a decision may be affirmed on any ground the record adequately supports even if the trial court did not consider that ground. ***State v. Costich***, 152 Wn.2d 463, 477, 98 P.3d 795 (2004). Moreover, "[a]n erroneous ruling with respect to such questions requires reversal only if there is a reasonable possibility that the testimony would have changed the outcome of trial." ***Aguirre***, 168 Wn.2d at 361.

"The credibility of a witness may be attacked by any party, including the party calling the witness." Evidence Rule (ER) 607. "In general, a witness's prior statement is admissible for impeachment purposes if it is inconsistent with the witness's trial testimony." ***State v. Newbern***, 95 Wn. App. 277 292, 975 P.2d 1041 (1999).

"[T]he purpose of using prior inconsistent testimony to impeach is to allow an adverse party to show that the witness tells different stories at different times" and "[f]rom this, the jury may disbelieve the witness's trial testimony." *Id.* at 293.

"If a witness does not testify at trial about the incident, whether from lack of memory or another reason, there is no testimony to impeach," but "even if a witness cannot remember making a prior inconsistent statement, if the witness testifies at trial to an inconsistent story, the need for the jury to know that this witness may be unreliable remains compelling." ***Newbern***, 95 Wn. App. at 293.

ER 613(b) provides, in relevant part, that

> [e]xtrinsic evidence of a prior inconsistent statement by a witness is not admissible unless the witness is afforded an opportunity to explain or deny the same and the opposite party is afforded an opportunity to interrogate the witness thereon, or the interests of justice otherwise require.

Moreover, "[i]t is well settled that neither party may impeach a witness on a collateral issue; that is, on facts not directly relevant to the trial issue." ***Aguirre***, 168 Wn.2d at 362. Issues are collateral if they could not be shown in evidence for any purpose independent of the contradiction. ***State v. Alexander***, 52 Wn. App. 897, 901-902, 765 P.2d 321 (1988). "Facts are relevant if they have a tendency to make the existence of any consequential fact more or less probable." *Id.*; ER 401. "An issue is collateral if it is not admissible independently of the impeachment purpose" because "a witness may be impeached on only those facts directly admissible as relevant to the trial issue." ***State v. Fankhouser***, 133 Wn. App. 689, 693, 138 P.3d 140 (2006).

If a cross-examiner chooses to question a witness about a collateral matter, he or she accepts the risk of the answers given. *See,* ***State v. Oswalt***, 62 Wn.2d 118, 121, 381 P.2d 617 (1963). In ***State v. Stepp***, 18 Wn. App. 304, 569 P.2d 1169 (1977), *review denied*, 89 Wn.2d 1015 (1978), the court held that contrary statements which serve "the sole purpose of demonstrating an inconsistency" in the witness's recorded statement to police was inadmissible. *Id.* at 310-311.

In the present case, the defendant argues that he should have been permitted to present testimony from Corrie Dengler, who stated that T.M. falsely accused multiple people of sexual abuse and also falsified a suicide attempt under ER 613. Because "[i]t is well settled that neither party may impeach a witness on a collateral issue; that is, on facts not directly relevant to the trial issue," ***Aguirre***, 168 Wn.2d at 362, the defendant had no right to introduce evidence of T.M.'s alleged prior sexual abuse allegations or suicide attempt. At best, the offered testimony would be a false statement about an extraneous issue.

In this case, there are two separate areas of alleged impeachment. The first is the offered evidence of Corrie Dengler that T.M. told her that she had previously fabricated allegations of sexual abuse and attempted suicide. The second is the offered testimony of Corrie Dengler that she had a conversation with T.M. regarding the allegedly false allegations and suicide attempt, which T.M. denied. Both matters—the underlying allegations and the fact of the conversation itself—are both collateral

matters. Neither one has any relevance as to the issues in the case against the defendant. Evidence of both the prior alleged false allegations and suicide attempt would both be collateral matters under ER 613, and was also properly excluded under ER 608.

Regardless, defendant was permitted to ask T.M. about both of those matters. T.M. denied stating to Corrie that she had falsely accused other individuals of sexual abuse and denied that her suicide attempt was not genuine. The defendant, however, asserts that he should then have been entitled to go even further and introduce testimony from Corrie refuting that testimony. Because that evidence was not admissible, its exclusion could not have violated defendant's rights to present testimony and confront and cross-examine adverse witnesses. *See. e.g.,* ***Rafay***, 168 Wn. App. at 795.

It is well established that "[a] defendant in a criminal case has a constitutional right to present a defense consisting of ***relevant evidence that is not otherwise inadmissible***.'" ***State v. Rafay***, 168 Wn. App. 734, 795, 285 P.3d 83 (2012) (*quoting* ***State v. Rehak***, 67 Wn. App. 157, 162, 834 P.2d 651 (1992)) (emphasis added); ***State v. Hudlow***, 99 Wn.2d 1, 15, 659 P.2d 514 (1983))); ***Washington v. Texas***, 388 U.S. 14, 16, 87 S. Ct. 1920 (1967).

The defendant relies on ***State v. Roberts***, 25 Wn. App. 830, 611 P.2d 1297 (1980). Brief of Defendant, pages 14, 17. ***Roberts***, however, is easily distinguishable from the case at bar. In Roberts, the defendant was

charged with rape in the first degree and kidnapping in the second degree. *Id.* at 831. The victim, "Ms. A" had been scheduled to appear for a defense interview and failed to appear. *Id.* at 833. It was discovered that Ms. A had been physically disciplined by a parent for her failure to keep the appointment. *Id.* The trial court erred in failing to allow defense to cross examine Ms. A regarding the physical discipline she received. *Id.* The court held that "failure to permit the defendant to pursue a theory that Ms. A's testimony was motivated by a compulsion to cooperate with the prosecutor constitutes a denial of the defendant's right to effective cross examination." *Id.* at 836.

First, the court in ***Roberts*** does not conduct an analysis under ER 613, so it is distinguishable from the case at bar in that a different evidence rule is being applied. It does not contemplate an analysis of the evidence being extrinsic evidence of a collateral matter. Second, the offered testimony—that Ms. A received physical discipline for failing to cooperate on the case—is evidence that would go toward her motivations on the same case. In the case at bar, there is no such connection between the offered testimony, that Ms. A had allegedly made false allegations in the past against unrelated people, and the current charges against this defendant.

As stated above, the defendant would have to establish both deficient performance and prejudice in order to prevail on an ineffective assistance of counsel claim. He cannot establish either prong because, had

his attorney sought to admit this evidence under ER 613, that request would have been denied because it would have been extrinsic evidence on a collateral matter. Because the excluded statements defendant sought to admit here were inadmissible under ER 613, the defendant had no right to present them as evidence. Hence, his constitutional rights to present testimony and confront and cross-examine adverse witnesses were not violated, and his conviction should be affirmed.

D. CONCLUSION.

For the above stated reasons, the State respectfully requests that the defendant's convictions be affirmed.

DATED: March 10, 2017.

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The undersigned certifies that on this day she delivered by U.S. mail or ABC-LMI delivery to the attorney of record for the appellant and appellant c/o his attorney true and correct copies of the document to which this certificate is attached. This statement is certified to be true and correct under penalty of perjury of the laws of the State of Washington. Signed at Tacoma, Washington, on the date below.

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